REMARKS

Applicant respectfully traverses and requests reconsideration.

As an initial matter, Applicant has amended para. [0050] of the specification to correct a typographical error.

Applicant has also amended claims 1, 5, and 24. Claim 1 has been amended to recite that the command type code indicates whether the encoded multimedia display command employs an address index. Support for this amendment may be found, for example, in paras. [0037] and [0050] of the present application. Claims 5 and 24 have been amended to recite that the lookup table comprises a plurality of accessed addresses. Support for this amendment may be found, for example, in FIG. 13 and paras. [0050] and [0052] of the present application.

Rejections under Section 102

Claims 1–4 and 6–9 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Pub. No. 2004/0068642 to Tanaka et al. ("Tanaka"). With respect to currently amended claim 1, Applicants respectfully submit that Tanaka fails to teach, *inter alia*, "a command type code indicating whether the encoded multimedia display command employs an address index." The previous Office Action broadly relies on para. [0183] and FIGS. 29–32 as teaching an encoded multimedia command including a command type code and an operation code. However, it should be noted up front that the cited portions of Tanaka do not depict or describe an encoding scheme at all.

Rather, the cited portions relate to "diagrams explaining outlined functionality of the instructions executed by the processor 1." (Tanaka, ¶ [0182]). Thus, the cited portions of Tanaka explain characteristics of, for example, a SIMD instruction (see, e.g., FIG. 29), but fail to disclose the actual structure of an encoded multimedia display command (i.e., what information is conveyed by, for example, particular bits in an encoded data packet representing a SIMD

instruction). Because Tanaka is silent as to what information is actually contained in a particular encoded multimedia display command, it certainly cannot be asserted as teaching an encoded multimedia display command including a command type code indicating whether the encoded multimedia display command employs an address index.

Conversely, the present application teaches, and claim 1 requires, a command type code indicating whether the encoded multimedia display command employs an address index. For example, as illustrated in FIGS. 6–12 of the present application, each encoded multimedia display command includes a most significant bit indicating whether the encoded multimedia display command is of type_zero or type_one. (Present Application, FIGS. 6–12, ¶ [0046]: "Consistent with the description of the type_zero command 220, commands 230 and 240 include a most significant bit '0' . . . ."). Type_zero commands have their most significant bit set to "0," indicating that they do not employ an address index. Rather, type_zero commands "include [a] byte_length data packet and [a] byte_address data packet," which directly specify the memory location to perform the particular operation on (e.g., read, write, etc.). In contrast, type_one commands have their most significant bit set to "1," indicating that they *do* employ an address index (i.e., client identifier). (Present Application, ¶ [0051]: "when the encoded multimedia display command is the type_one request, the encoded multimedia command further includes a client identifier."). "The client ID is an index to a lookup table of commonly accessed addresses." (Present Application, ¶ [0050]).

Including a command type code indicative of whether the encoded multimedia display command employs an address index is advantageous for several reasons. For example, this arrangement reduces power consumption within the system, reduces memory consumption within the system, and conserves bandwidth over, for example, the MLINK. (Present

Application, ¶ [0032]: "the command type and the operation code provide for reduced power and memory consumption and a reduction in bandwidth requirements."). Because Tanaka fails to teach a command type code indicating whether the encoded multimedia display command employs an address index, Applicant submits that claim 1 is in condition for allowance.

Dependent claims 2–4 and 6–9, being dependent upon an allowable base claim, are also allowable over Tanaka to the extent that they incorporate the limitations of the independent claim and because they recite additional patentable subject matter.

Claims 10, 14–17, 22 and 23 stand rejected under 35 U.S.C. § 102(e) as being anticipated by .S. Pat. No. 6,876,379 to Fisher ("Fisher"). With respect to claims 10 and 16, Applicants respectfully submit that Fisher fails to teach, *inter alia*, "wherein the encoded multimedia display command is encoded in a multimedia device link command protocol." Fisher is directed to a portable image capture device (e.g., mobile videophone) capable of transmitting and receiving information in mobile telecommunications systems. (Fisher, Abstract). However, Fisher is notably silent as to the use of *any* encoding/decoding of multimedia display commands whatsoever. Absent any discussion on encoding/decoding multimedia display commands, Fisher cannot be asserted as teaching an encoded multimedia display command that is encoded in a multimedia device link command protocol.

Conversely, the present application teaches, and claims 10 and 16 require, wherein the encoded multimedia display command is encoded in a multimedia device link command protocol. As noted repeatedly throughout the Present Application, a multimedia device link command protocol generally includes encoding the multimedia display command such that it contains, for example, a command type code and an operation code. (Present Application, ¶ [0031]: "an encoded multimedia display command encoded within a multimedia link interface

protocol, the encoded multimedia display command including a command type code and an operation code."). Encoding multimedia display commands in this protocol advantageously allows for reduced data transmission fields. (Present Application, ¶ [0022]: "the multimedia link interface command protocol is a protocol allowing for reduced data transmission fields."). As noted above, reduced data transmission fields translate into reduced power consumption, memory consumptions, and bandwidth conservation. Because Fisher fails to teach encoding multimedia display commands in a multimedia device link command protocol, Applicant respectfully submits that claims 10 and 16 are in condition for allowance.

Dependent claims 14–17, 22, and 23, being dependent upon an allowable base claim, are also allowable over Fisher to the extent that they incorporate the limitations of the independent claim and because they recite additional patentable subject matter.

Rejections under Section 103

Claims 11–12, 18–19, and 24–28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Fisher in view of Tanaka. With respect to currently amended claim 24, Applicant submits that neither Fisher nor Tanaka, alone or in combination, teach wherein the command type code is utilized to determine if the encoded multimedia display command is at least one of the following: a type_zero command and a type_one command. For example, the previous Office Action admits that Fisher fails to teach "the encoded multimedia display command includes a command type code and an operation code such that the command type code is at least one of the following: a type-zero command and a type_[one] command." (Office Action of 3/1/2010, p. 8). The previous Office Action also states "Tanaka . . . fails to teach the encoded multimedia display command is the type one command." (Office Action of 3/1/2010, p. 9). Accordingly, the previous Office Action admits that neither Tanaka nor Fisher teach an encoded multimedia display command that includes a command type code indicating whether the

encoded multimedia display command is a type_one command or type_zero command. Because neither Fisher nor Tanaka, alone or in combination, teach wherein the command type code is utilized to determine if the encoded multimedia display command is at least one of the following: a type_zero command and a type_one command, Applicant respectfully submits that claim 24 is in condition for allowance.

Additionally, the previous Office Action fails to address the limitation in claim 24 reciting "accessing a lookup table using the client identifier as an index." Applicant respectfully submits that neither Fisher nor Tanaka, alone or in combination, teach this limitation. Accordingly, claim 24 is believed to be in condition for allowance for this reason as well.

Dependent claims 11–12, 18–19, and 25–28, being dependent upon an allowable base claim, are also allowable over Fisher in view of Tanaka to the extent that they incorporate the limitations of the independent claim and because they recite additional patentable subject matter.

Claim 5 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Tanaka in view of U.S. Pub. No. 2003/0117585 to Lee ("Lee"). With respect to currently amended claim 5, Applicant respectfully submits that Lee fails to teach "accessing a lookup table comprising a plurality of accessed addresses using the client identifier as an index." The cited portion of Lee is directed to a cluster decoder 1202 and a lookup table 1201. However, the lookup table of Lee 1201 is not comprised of a plurality of accessed addresses as required by claim 5. Rather, the lookup table of Lee appears to contain information about code words, such as their characteristics and the length of a decoded code word. (Lee, ¶ [0224]: "A cluster decoder comprising a CLUST-DEC (1202) and a look-up table (LUT; 1201) produces an LUT index stored by classifying code words by their characteristics and the length of decoded code word."). Because Lee fails to teach accessing a lookup table comprising a plurality of accessed addresses

using the client identifier as an index, Applicant respectfully submits that claim 5 is in condition for allowance. It should be noted that Lee is equally inapplicable to claim 24 for at least this reason as well.

Claims 13 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Fisher in view of Lee. Dependent claims 13 and 20, being dependent upon an allowable base claim, are also allowable over Fisher in view of Lee to the extent that they incorporate the limitations of the independent claim and because they recite additional patentable subject matter.

Claim 21 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Fisher in view of U.S. Pat. No. 7,027,056 to Koselj ("Koselj"). Dependent claim 21, being dependent upon an allowable base claim, is also allowable over Fisher in view of Koselj to the extent that it incorporates the limitations of the independent claim and because it recites additional patentable subject matter.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request reconsideration and withdraw of all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this response is respectfully requested.

If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to contact the undersigned at the number below.

Respectfully submitted,

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